

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

CAMBRIA COMPANY LLC,

Plaintiff,

Case No. 1:20-cv-00508 (JMB/PJG)

vs.

Hon. Jane M. Beckering

LAKESIDE SURFACES, INC.,

Defendant.

_____ /

STIPULATION TO MODIFY AMENDED CASE MANAGEMENT ORDER

WHEREAS pursuant to the Amended Case Management Order (ECF No. 86), the deadline to submit dispositive motions in the above-captioned matter is June 24, 2022;

WHEREAS Defendant Lakeside Surfaces, Inc. (“Lakeside”) previously noticed the deposition of Cambria Company LLC’s (“Cambria”) President and CEO, Mr. Martin Davis (also a named inventor on the Asserted Patent), on September 23, 2021 (ECF No. 39); April 1, 2022 (ECF No. 63); April 11, 2022 (ECF No. 65); April 19, 2022 (ECF No. 71); and June 9, 2022 (ECF No. 99);

WHEREAS Cambria previously noticed the deposition of Mr. Robert Riegler, former President of Lakeside, on February 17, 2022 (ECF No. 53); March 11, 2022 (ECF No. 60); and May 10, 2022 (ECF No. 82);

WHEREAS Cambria and Lakeside had ongoing disputes regarding the proper scope of Mr. Davis’s deposition, which were ultimately resolved by the Court’s recent ruling on Cambria’s Motion for Leave to Amend its Complaint (ECF No. 92);

WHEREAS Mr. Riegler was unavailable for deposition on the dates previously noticed by Cambria but is available to sit for deposition on June 22, 2022 and will appear for his deposition on that date;

WHEREAS Mr. Davis is unavailable prior to June 24, 2022 for his deposition but is available to sit for deposition on June 28, 2022 and will appear for his deposition on that date;

WHEREAS Lakeside desires to complete Mr. Davis's deposition prior to the submission of dispositive motions, believes that his testimony may impact the positions asserted in any motion from Lakeside, and requests at least six days between Mr. Davis's deposition and the submission of dispositive motions;

IT IS HEREBY STIPULATED AND AGREED by the undersigned counsel for Cambria and Lakeside, subject to the approval of the Court, that the Amended Case Management Order (ECF No. 86) is modified such that the deadline to file dispositive motions is extended from June 24, 2022 to July 8, 2022; Robert Riegler shall appear for his deposition on June 22, 2022; and Martin Davis shall appear for his deposition on June 28, 2022.

No other deadlines in the Amended Case Management Order are impacted by this stipulation.

STIPULATED:

PRICE HENEVELD LLP

s/ Gregory A. Lewis
Gregory A. Lewis (P75796)
Matthew J. Gipson (P60169)
PRICE HENEVELD LLP
695 Kenmoor Ave., S.E., P.O. Box 2567
Grand Rapids, MI 49501
Tel: 616-949-9610
glewis@priceheneveld.com
mgipson@priceheneveld.com

GARAN LUCOW MILLER, P.C.

s/ Robert D. Goldstein
Robert D. Goldstein (P38298)
John W. Whitman (P37932)
GARAN LUCOW MILLER, P.C.
10801 South Saginaw Street, Bldg. D
Grand Blanc, MI 48439
Tel: 810-695-3700
rgoldstein@garanlucow.com
jwhitman@garanlucow.com

John C. Adkisson
FISH & RICHARDSON P.C.
3200 RBC Plaza
60 South 6th Street
Minneapolis, MN 55402
Tel: 612-335-5070
adkisson@fr.com

Leland P. Schermer
MARCUS & SHAPIRA LLP
301 Grant Street,
One Oxford Centre, 35th Floor
Pittsburgh, PA 15219-6401
Tel: 412-338-3990
schermer@marcus-shapira.com

Grayson P. Sundermeir
FISH & RICHARDSON P.C.
222 Delaware Avenue, 17th Floor
Wilmington, DE 19801
Tel: 302-652-5070
sundermeir@fr.com

*Attorneys for Defendant Lakeside
Surfaces, Inc.*

*Attorneys for Plaintiff Cambria Company
LLC*

Dated: June 21, 2022

ORDER

IT IS SO ORDERED this _____ day of _____, 2022.

The Honorable Jane M. Beckering
United States District Judge